

SUMMONS *on petition*
(CITACION JUDICIAL)

SUM-100

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

Westchester Business Improvement Association

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

Adrian Riskin

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

JUN 08 2018

Sherri R. Carter, Executive Officer/Clerk of Court
By: Judi Lara, Deputy

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

Los Angeles County Superior Court, Stanley Mosk Courthouse
111 North Hill Street, Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):

BS172761

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Anna von Herrmann; 2443 Fillmore Street #380-7379, San Francisco, CA 94115; 415-779-5619

BY FAX

DATE:

(Fecha)

JUN 08 2018

SHERRI R. CARTER

Clerk, by
(Secretario)

Judi Lara

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): Westchester Business Improvement District

- under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

4. ☐ by personal delivery on (date):

BY FAX

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Anna von Herrmann, SBN 301670 2443 Fillmore St. #380-7379 San Francisco, CA 94115		FOR COURT USE ONLY CONFORMED COPY ORIGINAL FILED Superior Court of California County of Los Angeles JUN 08 2018 Sherri R. Carter, Executive Officer/Clerk of Court By: Judi Lara, Deputy
TELEPHONE NO.: 415-779-5619 ATTORNEY FOR (Name): Adrian Riskin	FAX NO.:	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill St. MAILING ADDRESS: 111 North Hill St. CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse		
CASE NAME: Riskin v. Westchester Business Improvement Association		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
		CASE NUMBER: BS172761 JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input checked="" type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (specify): 1: California Public Records Act

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 6, 2018
 Anna von Herrmann

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed in sanctions. (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller
Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

BY FAX

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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District. | 7. Location where petitioner resides. |
| 2. Permissive filing in central district. | 8. Location wherein defendant/respondent functions wholly. |
| 3. Location where cause of action arose. | 9. Location where one or more of the parties reside. |
| 4. Mandatory personal injury filing in North District. | 10. Location of Labor Commissioner Office. |
| 5. Location where performance required or defendant resides. | 11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
| 6. Location of property or permanently garaged vehicle. | |

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
		<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Real Property	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer	Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2, 8
		<input checked="" type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
Miscellaneous Civil Complaints	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)		1, 2, 8	
Miscellaneous Civil Petitions	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
		<input type="checkbox"/> A6100 Other Civil Petition	2, 9

SHORT TITLE: Riskin v. Westchester Business Improvement Association	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.			ADDRESS: 8929 S. Sepulveda Boulevard #130
CITY: Westchester	STATE: CA	ZIP CODE: 90045	

Step 5: Certification of Assignment: I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: June 6, 2018


 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within **15** days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.

Superior Court of California County of Los Angeles



ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION PACKET

The person who files a civil lawsuit (plaintiff) must include the ADR information Packet with the complaint when serving the defendant. Cross-complainants must serve the ADR Information Packet on any new parties named to the action together with the cross-complaint.

There are a number of ways to resolve civil disputes without having to sue someone. These alternatives to a lawsuit are known as alternative dispute resolution (ADR).

In ADR, trained, impartial persons decide disputes or help parties decide disputes themselves. These persons are called neutrals. For example, in mediations, the neutral is the mediator. Neutrals normally are chosen by the disputing parties or by the court. Neutrals can help resolve disputes without having to go to court.

Advantages of ADR

- Often faster than going to trial
- Often less expensive, saving the litigants court costs, attorney's fees and expert fees.
- May permit more participation, allowing parties to have more control over the outcome.
- Allows for flexibility in choice of ADR processes and resolution of the dispute.
- Fosters cooperation by allowing parties to work together with the neutral to resolve the dispute and mutually agree to remedy.
- There are fewer, if any, court appearances. Because ADR can be faster and save money, it can reduce stress.

Disadvantages of ADR - ADR may not be suitable for every dispute.

- If ADR is binding, the parties normally give up most court protections, including a decision by a judge or jury under formal rules of evidence and procedure, and review for legal error by an appellate court.
- ADR may not be effective if it takes place before the parties have sufficient information to resolve the dispute.
- The neutral may charge a fee for his or her services.
- If the dispute is not resolved through ADR, the parties may then have to face the usual and traditional costs of trial, such as attorney's fees and expert fees.

The Most Common Types of ADR

- **Mediation**

In mediation, a neutral (the mediator) assists the parties in reaching a mutually acceptable resolution of their dispute. Unlike lawsuits or some other types of ADR, the parties, rather than the mediator, decide how the dispute is to be resolved.

- **Mediation is particularly effective** when the parties have a continuing relationship, like neighbors or business people. Mediation is also very effective where personal feelings are getting in the way of a resolution. This is because mediation normally gives the parties a chance to express their feelings and find out how the other sees things.
- **Mediation may not be effective** when one party is unwilling to cooperate or compromise or when one of the parties has a significant advantage in power over the other. Therefore, it may not be a good choice if the parties have a history of abuse or victimization.

- **Arbitration**

In arbitration, a neutral person called an “arbitrator” hears arguments and evidence from each side and then decides the outcome of the dispute. Arbitration is typically less formal than a trial, and the rules of evidence may be relaxed. Arbitration may be either “binding” or “non-binding.” Binding arbitration means the parties waive their right to a trial and agree to accept the arbitrator’s decision as final. Non-binding arbitration means that the parties are free to request a trial if they reject the arbitrator’s decision.

Arbitration is best for cases where the parties want another person to decide the outcome of their dispute for them but would like to avoid the formality, time, and expense of a trial. It may also be appropriate for complex matters where the parties want a decision-maker who has training or experience in the subject matter of the dispute.

- **Mandatory Settlement Conference (MSC)**

Settlement Conferences are appropriate in any case where settlement is an option.

Mandatory Settlement Conferences are ordered by the Court and are often held near the date a case is set for trial. The parties and their attorneys meet with a judge who devotes his or her time exclusively to preside over the MSC. The judge does not make a decision in the case but assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement.

The Los Angeles Superior Court Mandatory Settlement Conference (MSC) program is free of charge and staffed by experienced sitting civil judges who devote their time exclusively to presiding over MSCs. The judges participating in the judicial MSC program and their locations are identified in the List of Settlement Officers found on the Los Angeles Superior Court website at <http://www.lacourt.org/>. This program is available in general jurisdiction cases with represented parties from independent calendar (IC) and Central Civil West (CCW) courtrooms. In addition, on an ad hoc basis, personal injury cases may be referred to the program on the eve of trial by the personal injury master calendar courts in the Stanley Mosk Courthouse or the asbestos calendar court in CCW.

In order to access the Los Angeles Superior Court MSC Program the judge in the IC courtroom, the CCW Courtroom or the personal injury master calendar courtroom must refer the parties to the program. Further, all parties must complete the information requested in the Settlement Conference Intake Form and email the completed form to mscdept18@lacourt.org.

Additional Information

To locate a dispute resolution program or neutral in your community:

- Contact the California Department of Consumer Affairs (www.dca.ca.gov) Consumer Information Center toll free at 800-952-5210, or;
- Contact the local bar association (<http://www.lacba.org/>) or;
- Look in a telephone directory or search online for "mediators; or "arbitrators."

There may be a charge for services provided by private arbitrators and mediators.

A list of approved State Bar Approved Mandatory Fee Arbitration programs is available at <http://calbar.ca.gov/Attorneys/MemberServices/FeeArbitration/ApprovedPrograms.aspx#19>

To request information about, or assistance with, dispute resolution, call the number listed below. Or you may call a Contract Provider agency directly. A list of current Contract Provider agencies in Los Angeles County is available at the link below.

<http://css.lacounty.gov/programs/dispute-resolution-program-drp/>

County of Los Angeles Dispute Resolution Program
3175 West 6th Street, Room 406
Los Angeles, CA 90020-1798
TEL: (213) 738-2621
FAX: (213) 386-3995

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Superior Court of California
County of Los Angeles

JUN 08 2018

Sherri R. Carter, Executive Officer/Clerk of Court
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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES

BY FAX

BS172761

11 ADRIAN RISKIN,

12 Petitioner and Plaintiff,

13 vs.

14 WESTCHESTER BUSINESS IMPROVEMENT
15 ASSOCIATION,

16 Respondent and Defendant.

) Case No.:

) VERIFIED PETITION FOR WRIT OF
) MANDATE AND COMPLAINT FOR
) DECLARATORY AND INJUNCTIVE
) RELIEF

) [Gov't Code § 6250, *et seq.*; Civ. Proc. Code
) §§ 1060, 1085; Civ. Code § 3422]

1 **INTRODUCTION**

2 1. This is a petition to enforce the California Public Records Act (“CPRA”) against
3 Respondent, the Westchester Business Improvement Association. Petitioner and Plaintiff
4 (“Petitioner”) Adrian Riskin submitted ten requests for public records to the Westchester Town
5 Center Business Improvement District (“the BID”), which Respondent administers. These requests
6 asked for access to clearly-identifiable records fundamental to the BID’s operation that is subject to
7 mandatory disclosure under the CPRA. Respondent failed to respond at all to nine out of ten of
8 these requests. Respondent has thereby violated the CPRA.

9 2. The public’s access to information is obstructed by Respondent’s repeated and
10 systemic violation of the CPRA. By this Petition and Complaint (“Petition”) and pursuant to the
11 Code of Civil Procedure §§ 1085, *et seq.* and Government Code §§ 6250, *et seq.*,¹ Petitioner
12 respectfully requests from this Court: a writ of mandate to command Respondent to disclose all
13 non-exempt information Petitioner requested and thereby comply with the CPRA; a declaration that
14 Respondent’s conduct fails to comply with the CPRA; and a permanent injunction enjoining
15 Respondent from continuing its pattern and practice of violating the CPRA.

16 **JURISDICTION AND VENUE**

17 3. This Court has jurisdiction under Gov’t Code §§ 6258, 6259, Code of Civ. Proc.
18 § 1085, and Article VI, Section 10 of the California Constitution.

19 4. Venue is proper in this Court. The records in question, or some portion of them, are
20 situated in the County of Los Angeles, Gov’t Code § 6259; the acts or omissions complained of
21 occurred in the County of Los Angeles, Code of Civ. Proc. § 393; and Respondent is located in the
22 County of Los Angeles, Code of Civ. Proc. § 395.

23 **PARTIES**

24 5. Petitioner Adrian Riskin is a resident of Los Angeles, holds a PhD in mathematics, is
25 a mathematics professor at a local college, and is an open records activist. Riskin utilizes public
26 record requests to investigate and understand the activities of business improvement districts
27

28 _____
¹ Unless otherwise stated, all references to code sections are to the California Government Code.

1 (“BIDs”), the Los Angeles City government, and the relationship between the two. He publicizes
2 his findings to the public through blogging and community events. Information Riskin has
3 uncovered via CPRA requests has assisted academic researchers and the public at large in
4 understanding BIDs and their power in the community. For example, Riskin has worked with
5 students at the University of California, Berkeley School of Law’s Policy Advocacy Clinic and
6 documentary filmmakers producing a film on the Greater West Hollywood Food Coalition and the
7 Hollywood Media District BID. His research regarding the thwarted formulation of a Skid Row
8 Neighborhood Council, uncovered largely through public records requests, is currently featured as
9 part of an exhibit at the Los Angeles Poverty Department Museum. Additionally, Riskin has
10 empowered the public to use the CPRA effectively for both research and civic activism by
11 publishing a guide to the practical use of the CPRA in the City of Los Angeles. Riskin is a member
12 of the public within the meaning of §§ 6252(b)-(c).

13 6. Respondent the Westchester Business Improvement Association is a property
14 owners’ association pursuant to the Property and Business Improvement District Law of 1994,
15 California Streets & Highways Code § 36600, *et seq.* Respondent contracts with the City of Los
16 Angeles to administer the Westchester Town Center BID. Respondent is subject to the CPRA as a
17 matter of state law. California Streets & Highways Code § 36612. Respondent’s contract with the
18 City of Los Angeles also explicitly states that it is “subject to and must comply with” the CPRA.

19 **FACTUAL ALLEGATIONS**

20 **Riskin’s past CPRA requests have shed significant light on the operation of Los Angeles** 21 **BIDs**

22 7. The city of Los Angeles is home to approximately 40 BIDs, including the
23 Westchester Town Center BID. Although BIDs are private entities governed by unelected, private
24 officials, they collect monetary assessments from local property owners and can have substantial
25 impact on the manner in which neighborhoods function—from influencing which businesses
26 operate in an area, to instituting private security forces and expelling homeless individuals from
27 public spaces. Given their level of public power, BIDs are subject to relatively little public
oversight, making the CPRA an important tool to unveil and understand their activities.

28 8. As an open records activist, Riskin submits CPRA requests to BIDs throughout Los

1 Angeles that shed significant light on the BIDs' operation. His research has made a tangible impact
2 on open government, BID activity, and the enforcement of accountability laws in Los Angeles.

3 9. For example, through CPRA requests, Riskin discovered that various private BID
4 security patrols were not registering with the Los Angeles Police Commission as required by law.
5 As a result, the Los Angeles City Attorney resumed enforcement of that provision and took steps to
6 ensure that BID patrols did register with the Commission. This also resulted in the Police
7 Commission investigating a BID patrol for excessive use of force, thereby acknowledging that it
8 had jurisdiction over citizen complaints against private BID security. These changes would not have
9 been possible without Riskin's ability to obtain information from the BIDs via CPRA requests.

10 10. As another example, through CPRA requests, Riskin found that armed BID patrols
11 contracting with the Hollywood Property Owners Alliance were responsible for more than 1,000
12 custodial arrests of Hollywood homeless residents each year. Shortly after Riskin began scrutinizing
13 these arrests through public records requests, BID patrol arrests plummeted 70%—from 1,057 in
14 2014 to 313 in 2015. That trend of reduced arrests has continued into 2016 and 2017. Again, this
15 change would not have been possible without Riskin's ability to obtain BID records through CPRA
16 requests.

17 11. This type of information cannot be uncovered if BIDs do not comply with their
18 statutory obligation to make their records open for public inspection. Here, the Westchester Town
19 Center BID's failure to produce requested public records serves to maintain its activity in a shroud
20 of secrecy and to shield its operation from community oversight. Its refusal to respond to public
21 records requests violates the CPRA and frustrates the democratic process.

22 **Respondent violated the CPRA by failing to provide *any* public records in response to nine**
23 **of Riskin's public record requests**

24 12. Riskin submitted nine CPRA requests to the Westchester Town Center BID between
25 February and May 2017. These requests asked for specific and identifiable public records related to
26 the BID's operation. The requests variously requested minutes and agendas from the BID's board
27 meetings, the BID's transaction reports, the BID's Executive Director's appointment calendar, and
28 records of communications between BID staff and specifically-identified individuals. Riskin

1 submitted the requests via email to the BID's Executive Director, Donald Duckworth, at
2 "duckworth.donald@gmail.com," an email through which Duckworth conducts BID business. True
3 and accurate copies of each of these requests are attached to this petition at *Exhibits A-I*.

4 13. For each request, Riskin has sent between one and six additional communications to
5 Duckworth inquiring as to the status of the requests. *See Exhs. A-J*. While Duckworth
6 acknowledged receipt of one request, he failed to acknowledge the other eight. When Duckworth
7 failed to lawfully respond, Riskin also attempted to contact Karen Dial,² the BID's President, and
8 Miki Payne,³ the BID's Treasurer, by email—copying Duckworth—to inquire as to the status of his
9 requests. *See Exh. A*. Additionally, Riskin offered to create a single summary sheet of his requests
10 or to otherwise assist the BID in responding to the requests. *Id.* After receiving no lawful response
11 from the BID for over a year, Riskin sent one final email on February 20, 2018 summarizing his
12 nine requests and again asking that Respondent comply with the CPRA and provide the requested
13 records. *See Exh. J*. True and accurate copies of Riskin's follow-up communications with
14 Respondent are attached to this petition in *Exhibits A-J*.

15 14. Despite Riskin's repeated efforts to compel the BID to respond to his requests
16 without litigation, Respondent has completely failed to comply with its duties under the CPRA
17 regarding the requests. For all nine requests, Respondent failed to make any determination as to
18 whether the requests were for disclosable records in the BID's possession, let alone do so within the
19 ten-day statutory deadline. *See* § 6253(c). For all nine requests, Respondent failed to provide an
20 estimated date by which the records would be made available, let alone to do so within the ten-day
21 statutory deadline. *Id.* And for all nine requests, Respondent failed to provide even a single
22 requested record, let alone to do so "promptly" as required by law. *See* § 6253(b). To date, it has
23 been over 16 months since Respondent submitted his first request and over 13 months since Riskin

24
25
26 ² In response to this communication, Riskin received an automated reply stating that Karen Dial's email address was no
27 longer in use. The automatic reply stated, "If you need to reach Karen, please email Miki@drollingerproperties.com"—
seemingly referencing Miki Payne. *See Exh. A*.

28 ³ Riskin sent this communication via email to Miki Payne at "Miki@hbdrollinger.com." Records obtained through other
CPRA requests demonstrate that Payne regularly uses this email address in order to conduct BID business. A true and
accurate copy of one such email is attached to this petition as *Exhibit L*.

1 submitted his most recent request—all without lawful reply from Respondent.

2 15. Information obtained through other CPRA requests demonstrates that records
3 responsive to several of Riskin’s requests exist and are therefore clearly being withheld by
4 Respondent. As one example, Riskin’s February 24, 2017 request asked for all emails between
5 anyone at the BID and listed individuals, including Susan Levi and anyone at Urban Place
6 Consulting. Riskin is in possession of an email from Duckworth to various individuals, including
7 Susan Levi and Steve Gibson at Urban Place Consulting, regarding the BID’s farmers’ market—a
8 record clearly responsive to the request. As another example, Riskin’s first April 12, 2017 request
9 asked for all communications between anyone at the BID and anyone at the City of Los Angeles
10 during a specified date range. Riskin is in possession of an email from Rita Moreno, sent from an
11 “lacity.org” email address, to Duckworth and others describing an update in CPRA caselaw relevant
12 to local BIDs—also clearly responsive to Riskin’s request. True and accurate copies of these emails
13 are attached to this petition as *Exhibit M*.

14 16. Respondent has therefore repeatedly and as a matter of course violated the CPRA.
15 Respondent’s pattern and practice of failing to produce public records in response to requests
16 effectively makes the operations of the Westchester Town Center BID secret and shields
17 Respondent from public accountability. Judicial action is therefore necessary to enforce the
18 requirements of the CPRA against Respondent.

19 **Respondent violated the CPRA with respect to Riskin’s January 14, 2017 request by**
20 **delaying access to records and failing to disclose whether it withheld records**

21 17. On January 14, 2017, Riskin submitted a CPRA request to Respondent via email to
22 Duckworth. He requested copies of all agendas and minutes from the BID’s board meetings for
23 2016. Riskin also requested copies of communications between anyone at the BID and anyone at
24 the City of Los Angeles during 2016. A true and accurate copy of this request, as well as all further
25 communications between Riskin and Respondent regarding the request, are attached to this petition
26 as *Exhibit K*.

27 18. On January 24, 2017, Respondent emailed Riskin copies of board meeting agendas
28 and minutes. It further stated that it would “at least start” to provide the remainder of the

1 requested records by January 30, 2017. It stated it was “in the process of identifying existing emails
2 responsive to [Riskin’s] request,” and that it would notify Riskin if any records were subject to
3 exemptions. *See Exh. K*. This response makes clear that Respondent did not complete its
4 determination as to whether the requested records were disclosable or in its possession by the ten-
5 day statutory deadline. *See* § 6253(c).

6 19. Although Respondent initially stated it would provide the remainder of the
7 responsive records by January 30, 2017, it failed to do so until mid-April 2017. Respondent only
8 produced these records after receiving eight reminder emails from Riskin prompting Respondent to
9 provide the requested records. *See Exh. K*. In doing so, Respondent violated the CPRA by
10 unlawfully delaying and obstructing Riskin’s access to public records. *See* § 6253(d).

11 20. Ultimately, Respondent mailed Riskin a disk including a number of emails
12 responsive to the January 14, 2017 request on or about April 10, 2017. *See Exh. K*. Respondent did
13 not communicate to Riskin whether it fully produced all records responsive to the request, or
14 whether it withheld any portion of the records under the CPRA’s statutory exemptions. As such, it
15 is possible that Respondent further violated the CPRA by withholding records responsive to this
16 request.

17 **FIRST CAUSE OF ACTION:**
18 **PETITION FOR WRIT OF MANDATE PURSUANT TO THE CALIFORNIA PUBLIC**
19 **RECORDS ACT, GOV’T CODE § 6250, et seq.**

20 21. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 20
21 above, as if set forth in full.

22 **General principles of the California Public Records Act**

23 22. Under the California Public Records Act, § 6250 *et seq.*, all records that are
24 prepared, owned, used, or retained by any public agency and that are not subject to the CPRA’s
25 statutory exemptions to disclosure must be made publicly available for inspection and copying upon
26 request. §§ 6253(a)-(b).

27 23. When a member of the public submits a record request to an agency, the agency is
28 given ten days to determine whether the request seeks copies of disclosable public records in the

1 possession of the agency and must promptly notify the requestor of that determination and the
2 reasons therefor. § 6253(c). In statutorily-identified “unusual circumstances,” and “only to the
3 extent reasonably necessary to the proper processing of the particular request,” this time period may
4 be extended a maximum of 14 days. § 6253(c)-(d).

5 24. The law requires that agencies make non-exempt public records available to
6 requestors “promptly.” § 6253(b). It is unlawful for an agency “to delay or obstruct the inspection
7 of public records.” § 6253(d).

8 25. Where an agency withholds responsive records on the basis of a statutory exemption,
9 “the agency . . . must disclose that fact.” *Haynie v. Super. Ct.* 26 Cal. 4th 1061, 1072 (2001) (citing
10 § 6255). Even if portions of a document are exempt from disclosure, the agency must disclose the
11 remainder of the document. § 6253(a). The agency bears the burden of justifying nondisclosure.
12 § 6255(a). In determining whether exemptions apply, courts must follow the constitutional
13 imperative that the applicability of exemptions must be construed narrowly and that the people’s
14 right of access to public information must be construed broadly. Cal. Constitution, Art. I, § 3(b)(2).

15 26. The CPRA also requires the government to “assist the member of the public [to]
16 make a focused and effective request that reasonably describes an identifiable record or records” by
17 taking steps to “[a]ssist the member of the public to identify records and information that are
18 responsive to the request or to the purpose of the request, if stated.” § 6253.1. An agency that
19 receives a request must also “[p]rovide suggestions for overcoming any practical basis for denying
20 access to the records or information sought.” *Id.*

21 27. Whenever it is made to appear by verified petition to the Superior Court of the
22 county where the records or some part thereof are situated that certain public records are being
23 improperly withheld from a member of the public, the Court shall order the officer or person
24 charged with withholding the records to disclose the public record or show cause why he or she
25 should not do so. The Court shall decide the case after examining the record in camera (if permitted
26 by the Evidence Code), papers filed by the parties, and any oral argument and additional evidence
27 as the Court may allow. § 6259(a). If the Court finds that the failure to disclose is not justified, it
28 shall order the public official to make the record public. § 6259(b).

1 28. A petitioner prevails under the CPRA where the petitioner shows that an agency
2 unlawfully denied access to records. *Community Youth Athletic Center v. City of National City*, 220
3 Cal.App.4th 1385, 1446-1447 (2013). An agency is not protected from liability merely because the
4 denial of access was due to the agency's internal logistical problems or general neglect of its duties.
5 *Id.*

6 29. The CPRA further contains a mandatory attorney's fee provision for the prevailing
7 plaintiff. § 6259(d). The purpose of the provision is to provide "protections and incentives for
8 members of the public to seek judicial enforcement of their right to inspect public records subject to
9 disclosure." *Filarsky v. Super. Ct.*, 28 Cal.4th 419, 427 (2002).

10 30. Here, Respondent repeatedly violated the CPRA by failing to promptly disclose the
11 public records that Riskin requested. The public records that Riskin requested are not properly
12 subject to any of the CPRA's statutory exemptions, nor did Respondent cite any exemptions to
13 justify its nondisclosure. Respondent therefore acted unlawfully in contravening its duty to make
14 such records available.

15 **Respondent unlawfully denied access to Riskin's requested public records**

16 31. Riskin submitted ten requests for straightforward, easy-to-produce records that
17 would shed light on the day-to-day operations of the BID and its role within the Los Angeles
18 political sphere. For nine out of those ten requests, Respondent has denied all access to public
19 records through its pattern and practice of delay and non-response. Respondent never once indicated
20 that it conducted a search for those requested records. Respondent never once made a determination
21 as to whether those requested records were disclosable. Respondent never once provided an
22 estimate as to when those requested records would be produced. Respondent never once stated
23 under which exemptions, if any, it was withholding records. And most notably, Respondent never
24 once provided any public records in response to those nine requests, despite Riskin's repeated
25 follow-up communications regarding the requests. To date, it has been over 16 months since Riskin
26 submitted his first unanswered request and 13 months since he submitted his most recent request.
27 By failing to produce even one of these public records, Respondent is maintaining in a shroud of
28 secrecy records related to the BID's most basic activity and communications.

1 32. Respondent’s denial of access and its failure to even communicate with Riskin
2 regarding his requests not only violates the letter of the CPRA, but also its spirit. The CPRA is
3 predicated on the principle that:

4 Openness in government is essential to the functioning of democracy. Implicit in
5 the democratic process is the notion that government should be accountable for its
6 actions. In order to verify accountability, individuals must have access to
7 government files. Such access permits checks against the arbitrary exercise of
8 official power and secrecy in the political process.
9
10 *Int’l Fed. Of Professional and Technical Engineers, Local 21, AFL-CIO v. Super. Ct.*, 42 Cal.4th
11 319, 328-39 (2007) (internal quotations omitted). By repeatedly failing to respond to requests for
12 such long periods of time, Respondent denies the public access to vital public information, and it
13 withholds access to records while they are current and most relevant to the public interest. It further
14 shields itself from public scrutiny and frustrates the democratic process.

15 33. Indeed, the portion of records that the BID did provide in response to Riskin’s first
16 request has already shed significant light on the BID’s activity and exercise of power in its
17 community. For example, emails between the BID and the City of Los Angeles demonstrate that the
18 BID requested that its assigned BID Analyst—who provides oversight to the BID and ensures its
19 compliance with the terms of its contract—be replaced. This request appears to have been
20 immediately granted by the City. As another example, produced emails show that the BID has
21 communicated with the office of Los Angeles City Councilmember Mike Bonin and the Los
22 Angeles Police Department (“LAPD”) with the intent of changing local ordinances in order to
23 disallow overnight parking within the BID’s purview; this effort is seemingly to deter homeless
24 individuals from sleeping in their cars and utilizing the BID’s electrical outlets in the area. Other
25 emails show BID Board members monitoring homeless individuals in the area and attempting to
26 have them arrested by the LAPD—once even where LAPD stated it had insufficient evidence to do
27 so. True and accurate copies of these communications are attached to this petition as *Exhibit N*.

28 34. Public access to records through the CPRA has therefore already shed notable light
on the BID’s activity and its operation outside the public eye. By withholding the remainder of the
requested information, Respondent is shielding from disclosure information that could reveal

1 additional BID actions of significant public concern.

2 **SECOND CAUSE OF ACTION:**
3 **DECLARATORY RELIEF PURSUANT TO THE CALIFORNIA PUBLIC RECORDS ACT,**
4 **GOV'T CODE § 6250, *et seq.*, CODE OF CIV. PROC. § 1060**

5 35. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 34
6 above, as if set forth in full.

7 36. Petitioner is entitled to seek declaratory relief due to violation of the CPRA. § 6258.
8 Petitioner has performed all conditions precedent to filing this petition. There are no administrative
9 exhaustion requirements under Government Code § 6250, *et seq.* Petitioner has no plain, speedy,
10 adequate remedy in the ordinary course of law other than the relief sought in this petition. *See* Code
11 of Civil Procedure § 1086.

12 37. Respondent has a clear, present, ministerial duty to comply with Government Code
13 § 6250, *et seq.* Respondent has repeatedly acted and continues to act in violation of the CPRA by
14 maintaining a pattern and practice of denial of access to public information through failure to
15 produce public records, impermissible delay, and non-responsiveness. § 6253(b), (d).

16 38. An actual controversy exists between the parties concerning whether Respondent has
17 engaged in conduct that violates the clear statutory requirements of the CPRA. A judicial
18 determination to resolve this actual controversy is necessary and appropriate at this time.

19 **THIRD CAUSE OF ACTION:**
20 **INJUNCTIVE RELIEF PURSUANT TO THE CALIFORNIA PUBLIC RECORDS ACT,**
21 **GOV'T CODE § 6250, *et seq.*, CIV. CODE § 3422**

22 39. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 38
23 above, as if set forth in full.

24 40. Petitioner is entitled to seek injunctive relief due to violation of the CPRA. § 6258. If
25 not enjoined by order of this Court, Respondent will continue its pattern and practice of unlawfully
26 denying and delaying access to public records, disregarding statutory requirements, and arbitrarily
27 preventing parties from obtaining disclosable information under the CPRA.

28 41. Petitioner does not have a plain, speedy, and adequate remedy in the ordinary course
of law.


1
2 **PRAYER FOR RELIEF**

3 WHEREFORE, Petitioner prays for judgment as follows:

- 4 1. For issuance a writ of mandate directing Respondent to provide Petitioner with all
5 requested records, except those records that the Court determines may lawfully be
6 withheld;
- 7 2. For a declaration that Respondent's conduct, policies, and pattern and practice of
8 denying access to public records violates the CPRA;
- 9 3. For a permanent injunction enjoining Respondent, its agents, employees, officers, and
10 representatives from continuing its existing pattern and practice of violating the
11 statutory requirements of the CPRA;
- 12 4. For Petitioner to be awarded reasonable attorney's fees and costs; and
- 13 5. For such other and further relief as the Court deems proper and just.
- 14

15 Dated: 6/6/18

Respectfully submitted,

16
17 
18 ANNA VON HERRMANN
19 Attorney for Petitioner and Plaintiff
20
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22
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25

26 **VERIFICATION**

27 I, ADRIAN RISKIN, am the Petitioner and Plaintiff in this action. I have read the foregoing
28 Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, and I know the

1 contents thereof. The same is true of my own knowledge, except as to those matters which are
2 therein alleged on information and belief, and, as to those matters, I also believe them to be true.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct. Executed on this the 6th day of June, 2018 in Los Angeles, California.

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8 ADRIAN RISKIN
9 Petitioner and Plaintiff
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EXHIBIT A

CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
Subject: CPRA request (WTCBID.2017.02.04.a)
Date: Saturday, February 04, 2017 8:05 AM
Size: 635 B

Good morning, Mr. Duckworth.

I'd like to take a look at by-vendor transaction reports for the Westchester BID from January 1, 2013 through January 31, 2017.

Thanks for your help,

Adrian

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Wednesday, February 15, 2017 4:59 AM
Size: 987 B

Good morning, Mr. Duckworth.

I wonder what the status of this request is?

Thanks,

Adrian

On Sat, Feb 4, 2017, at 08:05 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at by-vendor transaction reports for the Westchester BID from January 1, 2013 through January 31, 2017.

Thanks for your help,

Adrian

Re: CPRA request (WTCBID.2017.02.04.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Wednesday, February 15, 2017 8:09 AM
X-Delivered-To: adrian@mailingaddress.org
Size: 7 KB

Thank you for the reminder. We will respond as soon as we can.

On Wed, Feb 15, 2017 at 4:59 AM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Good morning, Mr. Duckworth.

I wonder what the status of this request is?

Thanks,

Adrian

On Sat, Feb 4, 2017, at 08:05 AM, adrian@mailingaddress.org wrote:

> Good morning, Mr. Duckworth.

>

> I'd like to take a look at by-vendor transaction reports for the
> Westchester BID from January 1, 2013 through January 31, 2017.

>

> Thanks for your help,

>

> Adrian

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Monday, February 27, 2017 10:21 AM
Size: 1 KB

Good morning, Mr. Duckworth.

I'm just checking in on this one.

Thanks,

Adrian

On Wed, Feb 15, 2017, at 08:09 AM, Donald Duckworth wrote:

Thank you for the reminder. We will respond as soon as we can.

On Wed, Feb 15, 2017 at 4:59 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I wonder what the status of this request is?

Thanks,

Adrian

On Sat, Feb 4, 2017, at 08:05 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at by-vendor transaction reports for the Westchester BID from January 1, 2013 through January 31, 2017.

Thanks for your help,

Adrian

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Wednesday, March 08, 2017 6:28 AM
Size: 2 KB

Hi Mr. Duckworth,

I wonder what's up with this one? As there's no question that this information is exempt, I don't see the reason for the delay.

Thanks,

Adrian

On Mon, Feb 27, 2017, at 10:21 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just checking in on this one.

Thanks,

Adrian

On Wed, Feb 15, 2017, at 08:09 AM, Donald Duckworth wrote:

Thank you for the reminder. We will respond as soon as we can.

On Wed, Feb 15, 2017 at 4:59 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I wonder what the status of this request is?

Thanks,

Adrian

On Sat, Feb 4, 2017, at 08:05 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at by-vendor transaction reports for the Westchester BID from January 1, 2013 through January 31, 2017.

Thanks for your help,

Adrian

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: kdial@hbdrollinger.com, miki@hbdrollinger.com
Cc: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@duckworth.donald@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Thursday, March 16, 2017 5:55 PM
Size: 3 KB

Good evening, WTCBID friends!

I wonder if you all could find a way to respond to my various CPRA requests which are presently being ignored by your ED, Don Duckworth. The law has very explicit response deadlines, and, for whatever reason, he's given up on discussing the matter with me. I need this material rather urgently.

I hope you will get in touch so that we can work out a mutually agreeable way to proceed.

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:28 AM, adrian@mailingaddress.org wrote:

Hi Mr. Duckworth,

I wonder what's up with this one? As there's no question that this information is exempt, I don't see the reason for the delay.

Thanks,

Adrian

On Mon, Feb 27, 2017, at 10:21 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just checking in on this one.

Thanks,

Adrian

On Wed, Feb 15, 2017, at 08:09 AM, Donald Duckworth wrote:

Thank you for the reminder. We will respond as soon as we can.

On Wed, Feb 15, 2017 at 4:59 AM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Good morning, Mr. Duckworth.

I wonder what the status of this request is?

Thanks,

Adrian

On Sat, Feb 4, 2017, at 08:05 AM, adrian@mailingaddress.org wrote:

Automatic reply: CPRA request (WTCBID.2017.02.04.a)

From: [Karen Dial <KDial@hbdrollinger.com>](mailto:KDial@hbdrollinger.com)
To: adrian@mailingaddress.org
Subject: Automatic reply: CPRA request (WTCBID.2017.02.04.a)
Date: Thursday, March 16, 2017 5:55 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 5 KB

This email box is no longer used.

If you need to reach Karen, please email Miki@drollingerproperties.com.

Re: CPRA request (WTCBID.2017.02.04.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Monday, March 20, 2017 3:16 AM
X-Delivered-To: adrian@mailingaddress.org
Size: 11 KB

Good morning Mr. Riskin...

Unfortunately my recovery from an emergency appendectomy has slowed our response to your request. We will fully comply as required by law. I am a little confused at all the email we have gotten from you. I will try to sort them out and respond later today.

On Mar 16, 2017 5:55 PM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Good evening, WTCBID friends!

I wonder if you all could find a way to respond to my various CPRA requests which are presently being ignored by your ED, Don Duckworth. The law has very explicit response deadlines, and, for whatever reason, he's given up on discussing the matter with me. I need this material rather urgently.

I hope you will get in touch so that we can work out a mutually agreeable way to proceed.

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:28 AM, adrian@mailingaddress.org wrote:

> Hi Mr. Duckworth,

>

> I wonder what's up with this one? As there's no question that this
> information is exempt, I don't see the reason for the delay.

>

> Thanks,

>

> Adrian

>

> On Mon, Feb 27, 2017, at 10:21 AM, adrian@mailingaddress.org wrote:

>> Good morning, Mr. Duckworth.

>>

>> I'm just checking in on this one.

>>

>> Thanks,

>>

>> Adrian

>>

>> On Wed, Feb 15, 2017, at 08:09 AM, Donald Duckworth wrote:

>>> Thank you for the reminder. We will respond as soon as we can.

>>>

>>> On Wed, Feb 15, 2017 at 4:59 AM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

>>>

>>>> Good morning, Mr. Duckworth.

>>>>

>>>> I wonder what the status of this request is?

>>>>

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Monday, March 20, 2017 5:07 AM
Size: 4 KB

Hi Mr. Duckworth,

I'm sorry to hear about your surgery. I hope you're recovering. Please let me know if I can help you sort through them.

Thanks for answering,

Adrian

On Mon, Mar 20, 2017, at 03:16 AM, Donald Duckworth wrote:

Good morning Mr. Riskin...

Unfortunately my recovery from an emergency appendectomy has slowed our response to your request. We will fully comply as required by law. I am a little confused at all the email we have gotten from you. I will try to sort them out and respond later today.

On Mar 16, 2017 5:55 PM, <adrian@mailingaddress.org> wrote:

Good evening, WTCBID friends!

I wonder if you all could find a way to respond to my various CPRA requests which are presently being ignored by your ED, Don Duckworth. The law has very explicit response deadlines, and, for whatever reason, he's given up on discussing the matter with me. I need this material rather urgently.

I hope you will get in touch so that we can work out a mutually agreeable way to proceed.

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:28 AM, adrian@mailingaddress.org wrote:

Hi Mr. Duckworth,

I wonder what's up with this one? As there's no question that this information is exempt, I don't see the reason for the delay.

Thanks,

Adrian

On Mon, Feb 27, 2017, at 10:21 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just checking in on this one.

Thanks,

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Monday, March 27, 2017 2:26 PM
Size: 4 KB

Good afternoon, Mr. Duckworth.

I'm wondering what the status of this request might be. As I said, I'm happy to help you sort out my four CPRA requests to the WTCBID. Please let me know if a summary sheet or some other kind of help would be useful to you.

Thanks,

Adrian

On Mon, Mar 20, 2017, at 05:07 AM, adrian@mailingaddress.org wrote:

Hi Mr. Duckworth,

I'm sorry to hear about your surgery. I hope you're recovering. Please let me know if I can help you sort through them.

Thanks for answering,

Adrian

On Mon, Mar 20, 2017, at 03:16 AM, Donald Duckworth wrote:

Good morning Mr. Riskin...

Unfortunately my recovery from an emergency appendectomy has slowed our response to your request. We will fully comply as required by law. I am a little confused at all the email we have gotten from you. I will try to sort them out and respond later today.

On Mar 16, 2017 5:55 PM, <adrian@mailingaddress.org> wrote:

Good evening, WTCBID friends!

I wonder if you all could find a way to respond to my various CPRA requests which are presently being ignored by your ED, Don Duckworth. The law has very explicit response deadlines, and, for whatever reason, he's given up on discussing the matter with me. I need this material rather urgently.

I hope you will get in touch so that we can work out a mutually agreeable way to proceed.

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:28 AM, adrian@mailingaddress.org wrote:

Hi Mr. Duckworth,

I wonder what's up with this one? As there's no question that this

Re: CPRA request (WTCBID.2017.02.04.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.02.04.a)
Date: Monday, April 10, 2017 6:27 AM
Size: 4 KB

Good morning, Mr. Duckworth.

I'm just checking up on this one.

Thanks,

Adrian

On Mon, Mar 27, 2017, at 02:26 PM, adrian@mailingaddress.org wrote:

Good afternoon, Mr. Duckworth.

I'm wondering what the status of this request might be. As I said, I'm happy to help you sort out my four CPRA requests to the WTCBID. Please let me know if a summary sheet or some other kind of help would be useful to you.

Thanks,

Adrian

On Mon, Mar 20, 2017, at 05:07 AM, adrian@mailingaddress.org wrote:

Hi Mr. Duckworth,

I'm sorry to hear about your surgery. I hope you're recovering. Please let me know if I can help you sort through them.

Thanks for answering,

Adrian

On Mon, Mar 20, 2017, at 03:16 AM, Donald Duckworth wrote:

Good morning Mr. Riskin...

Unfortunately my recovery from an emergency appendectomy has slowed our response to your request. We will fully comply as required by law. I am a little confused at all the email we have gotten from you. I will try to sort them out and respond later today.

On Mar 16, 2017 5:55 PM, <adrian@mailingaddress.org> wrote:

Good evening, WTCBID friends!

I wonder if you all could find a way to respond to my various CPRA requests which are presently being ignored by your ED, Don Duckworth. The law has very explicit response deadlines, and, for whatever reason, he's given up on discussing the matter with me. I need this material rather urgently.

I hope you will get in touch so that we can work out a mutually agreeable way to proceed.

EXHIBIT B

CPRA request (WTCBID.2017.02.24.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth<duckworth.donald@gmail.com>)
Subject: CPRA request (WTCBID.2017.02.24.a)
Date: Friday, February 24, 2017 10:18 AM
Size: 1 KB

Good morning, Mr. Duckworth.

I'd like to see all emails between anyone at the WTCBID and any of:

- a. Tara Devine
- b. Ed Henning
- c. Susan Levi
- d. Anyone at Urban Place Consulting.

For Tara Devine it's sufficient to search devine-strategies.com, for Urban Place it's sufficient to search on urbanplaceconsulting.com, for Levi labids.org will do. I'm not sure about Henning. Either by last name, or if you know his email address that should suffice.

I need to see these in their native format along with attachments in their native formats. If you can export the emails in eml, msg, pst, or mbox that would be ideal and would preserve attachments. Otherwise some kind of OCR PDFs are acceptable, but to save time, if you're proposing to send PDFs, can you send me a sample of one with an attachment first?

I'd like to see these from January 1, 2015 through January 31, 2017.

Thanks,

Adrian

Re: CPRA request (WTCBID.2017.02.24.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.02.24.a)
Date: Wednesday, March 08, 2017 6:29 AM
Size: 2 KB

Good morning, Mr. Duckworth.

Is there any news on this request?

Thanks,

Adrian

On Fri, Feb 24, 2017, at 10:18 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'd like to see all emails between anyone at the WTCBID and any of:

- a. Tara Devine
- b. Ed Henning
- c. Susan Levi
- d. Anyone at Urban Place Consulting.

For Tara Devine it's sufficient to search devine-strategies.com, for Urban Place it's sufficient to search on urbanplaceconsulting.com, for Levi labids.org will do. I'm not sure about Henning. Either by last name, or if you know his email address that should suffice.

I need to see these in their native format along with attachments in their native formats. If you can export the emails in eml, msg, pst, or mbox that would be ideal and would preserve attachments. Otherwise some kind of OCR PDFs are acceptable, but to save time, if you're proposing to send PDFs, can you send me a sample of one with an attachment first?

I'd like to see these from January 1, 2015 through January 31, 2017.

Thanks,

Adrian

Re: CPRA request (WTCBID.2017.02.24.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.02.24.a)
Date: Monday, April 10, 2017 6:28 AM
Size: 2 KB

Good morning, Mr. Duckworth,

Can you let me know the status of this request?

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:29 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

Is there any news on this request?

Thanks,

Adrian

On Fri, Feb 24, 2017, at 10:18 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'd like to see all emails between anyone at the WTCBID and any of:

- a. Tara Devine
- b. Ed Henning
- c. Susan Levi
- d. Anyone at Urban Place Consulting.

For Tara Devine it's sufficient to search devine-strategies.com, for Urban Place it's sufficient to search on urbanplaceconsulting.com, for Levi labids.org will do. I'm not sure about Henning. Either by last name, or if you know his email address that should suffice.

I need to see these in their native format along with attachments in their native formats. If you can export the emails in eml, msg, pst, or mbox that would be ideal and would preserve attachments. Otherwise some kind of OCR PDFs are acceptable, but to save time, if you're proposing to send PDFs, can you send me a sample of one with an attachment first?

I'd like to see these from January 1, 2015 through January 31, 2017.

Thanks,

Adrian

EXHIBIT C

CPRA request (WTCBID.2017.03.12.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth<duckworth.donald@gmail.com>)
Subject: CPRA request (WTCBID.2017.03.12.a)
Date: Sunday, March 12, 2017 5:05 PM
Size: 686 B

Good afternoon, Mr. Duckworth.

I'm hoping to obtain copies of all agendas and minutes from Westchester Town Center BID board and committee meetings from 2015 and earlier, and also from 2017 to date.

Thanks so much for your help,

Adrian

Re: CPRA request (WTCBID.2017.03.12.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.03.12.a)
Date: Monday, April 10, 2017 6:28 AM
Size: 1 KB

Good morning, Mr. Duckworth.

Can you please let me know when I may expect this material?

Thanks,

Adrian

On Sun, Mar 12, 2017, at 05:05 PM, adrian@mailingaddress.org wrote:

Good afternoon, Mr. Duckworth.

I'm hoping to obtain copies of all agendas and minutes from Westchester Town Center BID board and committee meetings from 2015 and earlier, and also from 2017 to date.

Thanks so much for your help,

Adrian

EXHIBIT D

CPRA request (WTCBID.2017.03.31.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth<duckworth.donald@gmail.com>)
Subject: CPRA request (WTCBID.2017.03.31.a)
Date: Friday, March 31, 2017 6:41 PM
Size: 918 B

Good evening, Mr. Duckworth.

I need to look at all emails in the possession of anyone at the WTCBID, board, staff, or contractor, that are to/from/cc/bcc Lisa Trifiletti from January 1, 2013 through March 31, 2017.

I need these in some kind of native email format, eml, msg, pst, or mbox, with all attachments in their own native formats.

I need this material quite urgently. I implore you to meet the legally mandated deadlines.

Thanks for your help,

Adrian

EXHIBIT E

CPRA request (WTCBID.2017.04.12.a)

From: adrian@mailingaddress.org
To: duckworth.donald@gmail.com
Subject: CPRA request (WTCBID.2017.04.12.a)
Date: Wednesday, April 12, 2017 6:34 AM
Size: 1 KB

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles up until December 31, 2015 and also from January 1, 2017 through March 31, 2017. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains as well as lapd.online. Also I would like to see both emails and their attachments in their native electronic formats. The mbox format you've used for past requests is ideal.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

EXHIBIT F

CPRA request (WTCBID.2017.04.12.b)

From: adrian@mailingaddress.org
To: duckworth.donald@gmail.com
Subject: CPRA request (WTCBID.2017.04.12.b)
Date: Wednesday, April 12, 2017 6:36 AM
Size: 844 B

Good morning, Mr. Duckworth.

I'd like to take a look at all email communications between anyone on WTCBID staff on the one hand and anyone on the Board of Directors on the other hand. I'd like to see these from January 1, 2016 through March 31, 2017. The mbox format you've used for past requests is ideal.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

EXHIBIT G

CPRA request (WTCBID.2017.04.12.c)

From: adrian@mailingaddress.org
To: duckworth.donald@gmail.com
Subject: CPRA request (WTCBID.2017.04.12.c)
Date: Wednesday, April 12, 2017 10:54 AM
Size: 830 B

Good morning, Mr. Duckworth.

I'd like to take a look at all email communications between anyone on WTCBID staff on the one hand and anyone on the WPNC on the other hand. I'd like to see these from January 1, 2016 through March 31, 2017. The mbox format you've used for past requests is ideal.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

EXHIBIT H

CPRA request (WTCBID.2017.04.13.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth<duckworth.donald@gmail.com>)
Subject: CPRA request (WTCBID.2017.04.13.a)
Date: Thursday, April 13, 2017 4:53 PM
Size: 609 B

Good afternoon, Mr. Duckworth.

I'd like to see your appointment calendar as it relates to the WTCBID from January 1, 2016 through March 31, 2017.

Thanks,

Adrian

EXHIBIT I

CPRA request (WTCBID.2017.05.01.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@duckworth.donald@gmail.com)
Subject: CPRA request (WTCBID.2017.05.01.a)
Date: Monday, May 01, 2017 3:01 PM
Size: 967 B

Good afternoon, Mr. Duckworth.

I'd like to see copies of all emails from January 1, 2016 on between anyone at the WTC BID, board or staff, and any of the following addresses:

- a. christina@laxcoastal.com
- b. gmaleman@aol.com
- c. geminimik@yahoo.com
- d. lhughes@gatewaytola.org

I'd also like to see all emails between anyone at the WTCBID, board or staff, and anyone at the City of Los Angeles including LAPD and LAWA for April 2017.

That mbox format you used last time is ideal.

Thanks for your help,

Adrian

EXHIBIT J

WTCBID: Outstanding CPRA requests

From: adrian@internet-mail.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth<duckworth.donald@gmail.com>)
Cc: info@westchestertowncenter.com
Subject: WTCBID: Outstanding CPRA requests
Date: Tuesday, February 20, 2018 10:34 AM
Size: 1 KB

Dear Mr. Duckworth,

I have nine outstanding CPRA requests for various records of the Westchester Town Center BID. I encoded these with the following subject lines, which also include the date I sent them. You can use these as search strings to find the original requests.

Please acknowledge receipt of this email. Also, please inform me when I may expect you to begin providing me with these records. As you know, the CPRA requires you to respond to requests within 10 days. You have not yet responded to any of these requests even though some are more than a year old and none are less than 9 months old.

Thank you for your cooperation and assistance,

Adrian Riskin

Pending request codes:

WTCBID.2017.05.01.a
WTCBID.2017.04.13.a
WTCBID.2017.04.12.c
WTCBID.2017.04.12.b
WTCBID.2017.04.12.a
WTCBID.2017.03.31.a
WTCBID.2017.03.12.a
WTCBID.2017.02.24.a
WTCBID.2017.02.04.a

EXHIBIT K

CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: duckworth.donald@gmail.com
Subject: CPRA request (WTCBID.2017.01.14.a)
Date: Saturday, January 14, 2017 6:32 AM
Size: 1 KB

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

CPRA request (WTCBID.2017.01.14.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, January 24, 2017 3:31 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 2.5 MB

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

Good Afternoon Mr. Riskin...

Per your request of January 24 (above), the WTCBID intends to produce the responsive records. Attached are .pdf copies of the BID's 2016 Board Minutes and Board Agendas, which is the format in which we retain these documents.

We are in the process of identifying existing emails responsive to your request and expect to at least start providing those to you by January 30. If any are subject to exemptions, we will let you know when we send the rest. Please note that we do not have any "committees," nor any "staff" other than myself.

WBIA BD MTNG AGENDA 160121.pdf 11 KB

WBIA BD MTNG AGENDA 160218.pdf 12 KB

WBIA BD MTNG AGENDA 160421.pdf 12 KB

WBIA BD MTNG AGENDA 160519.pdf 212 KB

WBIA BD MTNG AGENDA 160721.pdf 212 KB

WBIA BD MTNG AGENDA 160922_3.pdf 218 KB

WBIA BD MTNG AGENDA 161117_2.pdf 221 KB

WBIA BD MTNG MINUTES 160121 exe.pdf 123 KB

WBIA BD MTNG MINUTES 160218 Pkg exe.pdf 116 KB

WBIA BD MTNG MINUTES 160421 Pkg exe.pdf 106 KB

WBIA BD MTNG MINUTES 160519 Pkg exe.pdf 113 KB

WBIA BD MTNG MINUTES 160721 Pkg exe.pdf 109 KB

WBIA BD MTNG MINUTES 160922_3 Pkg exe.pdf 188 KB

WBIA BD MTNG MINUTES 161117_2 Pkg exe.pdf 156 KB

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, January 24, 2017 3:33 PM
Size: 3 KB

Excellent. Thanks so much for your cooperation and assistance.

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

Good Afternoon Mr. Riskin...

Per your request of January 24 (above), the WTCBID intends to produce the responsive records. Attached are .pdf copies of the BID's 2016 Board Minutes and Board Agendas, which is the format in which we retain these documents.

We are in the process of identifying existing emails responsive to your request and expect to at least start providing those to you by January 30.

If any are subject to exemptions, we will let you know when we send the rest. Please note that we do not have any "committees," nor any "staff" other than myself.

Email had 14 attachments:

- + WBIA BD MTNG AGENDA 160121.pdf
15k (application/pdf)
- + WBIA BD MTNG AGENDA 160218.pdf
16k (application/pdf)
- + WBIA BD MTNG AGENDA 160421.pdf
16k (application/pdf)
- + WBIA BD MTNG AGENDA 160519.pdf
284k (application/pdf)

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth<duckworth.donald@gmail.com>)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, February 06, 2017 5:14 PM
Size: 3 KB

Hello Mr. Duckworth!

I wonder if there's any news on this request?

Thanks for your help,

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

Good Afternoon Mr. Riskin...

Per your request of January 24 (above), the WTCBID intends to produce the responsive records. Attached are .pdf copies of the BID's 2016 Board Minutes and Board Agendas, which is the format in which we retain these documents.

We are in the process of identifying existing emails responsive to your request and expect to at least start providing those to you by January 30.

If any are subject to exemptions, we will let you know when we send the rest. Please note that we do not have any "committees," nor any "staff" other than myself.

Email had 14 attachments:

+ WBIA BD MTNG AGENDA 160121.pdf

15k (application/pdf)

+ WBIA BD MTNG AGENDA 160218.pdf

16k (application/pdf)

Re: CPRA request (WTCBID.2017.01.14.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, February 06, 2017 6:57 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 12 KB

We are hoping for this week.

On Mon, Feb 6, 2017 at 5:14 PM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Hello Mr. Duckworth!

I wonder if there's any news on this request?

Thanks for your help,

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

> Good morning, Mr. Duckworth.

>

> I'd like to take a look at all communications, email or otherwise,
> between anyone at the WTCBID, including staff and Board members, and
> anyone at the City of Los Angeles during 2016. For emails this should
> include any message to/from/cc/bcc any address at lacity.org or any of
> its subdomains. Also I would like to see both emails and their
> attachments in their native electronic formats. This can be easily
> accomplished by exporting the emails as .eml, .msg, or .mbox files,
> which will automatically preserve attachments. If that's not feasible
> for you, OCR PDFs of the emails will do, but I will still need to see
> the attachments in their native formats.

>

> I would also like to see copies of all agendas and minutes from WTCBID
> Board and committee meetings for 2016.

>

> Thanks in advance for your help and cooperation, and I look forward to
> hearing from you.

>

> Adrian Riskin

>

>

>

> Good Afternoon Mr. Riskin...

>

> Per your request of January 24 (above), the WTCBID intends to produce the
> responsive records. Attached are .pdf copies of the BID's 2016 Board
> Minutes and Board Agendas, which is the format in which we retain these
> documents.

>

>

> We are in the process of identifying existing emails responsive to your
> request and expect to at least start providing those to you by January
> 30.

> If any are subject to exemptions, we will let you know when we send the
> rest. Please note that we do not have any "committees," nor any "staff"
> other than myself.

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, February 14, 2017 7:55 AM
Size: 4 KB

Good morning, Mr. Duckworth.

I wonder if there's any news on this matter?

Thanks,

Adrian

On Mon, Feb 6, 2017, at 06:57 PM, Donald Duckworth wrote:

[We are hoping for this week.](#)

On Mon, Feb 6, 2017 at 5:14 PM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Hello Mr. Duckworth!

I wonder if there's any news on this request?

Thanks for your help,

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

Good Afternoon Mr. Riskin...

Per your request of January 24 (above), the WTCBID intends to produce the responsive records. Attached are .pdf copies of the BID's 2016 Board Minutes and Board Agendas, which is the format in which we retain these

Re: CPRA request (WTCBID.2017.01.14.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, February 14, 2017 8:11 AM
X-Delivered-To: adrian@mailingaddress.org
Size: 14 KB

I am trying to finish this up asap.

On Feb 14, 2017 7:55 AM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Good morning, Mr. Duckworth.

I wonder if there's any news on this matter?

Thanks,

Adrian

On Mon, Feb 6, 2017, at 06:57 PM, Donald Duckworth wrote:

> We are hoping for this week.

>

> On Mon, Feb 6, 2017 at 5:14 PM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

>

> > Hello Mr. Duckworth!

> >

> > I wonder if there's any news on this request?

> >

> > Thanks for your help,

> >

> > Adrian

> >

> > On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

> > > Good morning, Mr. Duckworth.

> > >

> > > I'd like to take a look at all communications, email or otherwise,

> > > between anyone at the WTCBID, including staff and Board members, and

> > > anyone at the City of Los Angeles during 2016. For emails this should

> > > include any message to/from/cc/bcc any address at lacity.org or any of

> > > its subdomains. Also I would like to see both emails and their

> > > attachments in their native electronic formats. This can be easily

> > > accomplished by exporting the emails as .eml, .msg, or .mbox files,

> > > which will automatically preserve attachments. If that's not feasible

> > > for you, OCR PDFs of the emails will do, but I will still need to see

> > > the attachments in their native formats.

> > >

> > > I would also like to see copies of all agendas and minutes from WTCBID

> > > Board and committee meetings for 2016.

> > >

> > > Thanks in advance for your help and cooperation, and I look forward to

> > > hearing from you.

> > >

> > > Adrian Riskin

> > >

> > > _____

> > >

> > > Good Afternoon Mr. Riskin...

> > >

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, February 14, 2017 8:51 AM
Size: 5 KB

OK, thanks for your help.

Adrian

On Tue, Feb 14, 2017, at 08:11 AM, Donald Duckworth wrote:

I am trying to finish this up asap.

On Feb 14, 2017 7:55 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I wonder if there's any news on this matter?

Thanks,

Adrian

On Mon, Feb 6, 2017, at 06:57 PM, Donald Duckworth wrote:

We are hoping for this week.

On Mon, Feb 6, 2017 at 5:14 PM, <adrian@mailingaddress.org> wrote:

Hello Mr. Duckworth!

I wonder if there's any news on this request?

Thanks for your help,

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this

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include any message to/from/cc/bcc any address at lacity.org or any

of

its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not

feasible

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Wednesday, February 22, 2017 6:32 AM
Size: 5 KB

Good morning, Mr. Duckworth.

I'm just wondering what's up with this request?

Thanks,

Adrian

On Tue, Feb 14, 2017, at 08:51 AM, adrian@mailingaddress.org wrote:

OK, thanks for your help.

Adrian

On Tue, Feb 14, 2017, at 08:11 AM, Donald Duckworth wrote:

I am trying to finish this up asap.

On Feb 14, 2017 7:55 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I wonder if there's any news on this matter?

Thanks,

Adrian

On Mon, Feb 6, 2017, at 06:57 PM, Donald Duckworth wrote:

We are hoping for this week.

On Mon, Feb 6, 2017 at 5:14 PM, <adrian@mailingaddress.org> wrote:

Hello Mr. Duckworth!

I wonder if there's any news on this request?

Thanks for your help,

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this

should

include any message to/from/cc/bcc any address at lacity.org or any

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Wednesday, March 01, 2017 5:09 AM
Size: 6 KB

Good morning, Mr. Duckworth,

Can you let me know what's going on with this request?

Thanks,

Adrian

On Wed, Feb 22, 2017, at 06:32 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just wondering what's up with this request?

Thanks,

Adrian

On Tue, Feb 14, 2017, at 08:51 AM, adrian@mailingaddress.org wrote:

OK, thanks for your help.

Adrian

On Tue, Feb 14, 2017, at 08:11 AM, Donald Duckworth wrote:

I am trying to finish this up asap.

On Feb 14, 2017 7:55 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I wonder if there's any news on this matter?

Thanks,

Adrian

On Mon, Feb 6, 2017, at 06:57 PM, Donald Duckworth wrote:

We are hoping for this week.

On Mon, Feb 6, 2017 at 5:14 PM, <adrian@mailingaddress.org> wrote:

Hello Mr. Duckworth!

I wonder if there's any news on this request?

Thanks for your help,

Adrian

On Tue, Jan 24, 2017, at 03:31 PM, Donald Duckworth wrote:

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Wednesday, March 08, 2017 6:27 AM
Size: 7 KB

Good morning, Mr. Duckworth

We're coming up on two months for this request. I need this material quite urgently. Can you at least give me some idea when you expect to have ***any*** of it prepared?

Thanks,

Adrian

On Wed, Mar 1, 2017, at 05:09 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth,

Can you let me know what's going on with this request?

Thanks,

Adrian

On Wed, Feb 22, 2017, at 06:32 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just wondering what's up with this request?

Thanks,

Adrian

On Tue, Feb 14, 2017, at 08:51 AM, adrian@mailingaddress.org wrote:

OK, thanks for your help.

Adrian

On Tue, Feb 14, 2017, at 08:11 AM, Donald Duckworth wrote:

I am trying to finish this up asap.

On Feb 14, 2017 7:55 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I wonder if there's any news on this matter?

Thanks,

Adrian

On Mon, Feb 6, 2017, at 06:57 PM, Donald Duckworth wrote:

We are hoping for this week.

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Wednesday, March 15, 2017 8:43 AM
Size: 7 KB

Dear Mr. Duckworth,

You originally estimated that you'd be able to start providing this material by January 30. It's more than 6 weeks later. Do you at least have a revised estimate as to when you'll be able to provide me with access to these records?

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:27 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth

We're coming up on two months for this request. I need this material quite urgently. Can you at least give me some idea when you expect to have ***any*** of it prepared?

Thanks,

Adrian

On Wed, Mar 1, 2017, at 05:09 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth,

Can you let me know what's going on with this request?

Thanks,

Adrian

On Wed, Feb 22, 2017, at 06:32 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just wondering what's up with this request?

Thanks,

Adrian

On Tue, Feb 14, 2017, at 08:51 AM, adrian@mailingaddress.org wrote:

OK, thanks for your help.

Adrian

On Tue, Feb 14, 2017, at 08:11 AM, Donald Duckworth wrote:

I am trying to finish this up asap.

On Feb 14, 2017 7:55 AM, <adrian@mailingaddress.org> wrote:

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, March 27, 2017 2:25 PM
Size: 8 KB

Dear Mr. Duckworth,

Can you let me know the status of this request?

Thanks

Adrian

On Wed, Mar 15, 2017, at 08:43 AM, adrian@mailingaddress.org wrote:

Dear Mr. Duckworth,

You originally estimated that you'd be able to start providing this material by January 30. It's more than 6 weeks later. Do you at least have a revised estimate as to when you'll be able to provide me with access to these records?

Thanks,

Adrian

On Wed, Mar 8, 2017, at 07:27 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth

We're coming up on two months for this request. I need this material quite urgently. Can you at least give me some idea when you expect to have ***any*** of it prepared?

Thanks,

Adrian

On Wed, Mar 1, 2017, at 05:09 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth,

Can you let me know what's going on with this request?

Thanks,

Adrian

On Wed, Feb 22, 2017, at 06:32 AM, adrian@mailingaddress.org wrote:

Good morning, Mr. Duckworth.

I'm just wondering what's up with this request?

Thanks,

Adrian

On Tue, Feb 14, 2017, at 08:51 AM, adrian@mailingaddress.org wrote:

Re: CPRA request (WTCBID.2017.01.14.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, April 04, 2017 12:22 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 8 KB

We've assembled the material you requested in the referenced request. It's on a disk. How can I get that to you?

On Jan 14, 2017 6:32 AM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, April 04, 2017 12:30 PM
Size: 2 KB

Hey Mr. Duckworth,

It's not so easy to read optical disks these days. Perhaps you could upload it to my dropbox at:

<https://www.dropbox.com/request/GM0U4cW7Yqgk8kWrV67d>

This works just like copying stuff to a disk. You open the link and drag the folder onto it and it's transferred to me. Or maybe you have your own cloud file transfer service that you prefer?

Alternatively, can you tell me how much data there is?

Thanks,

Adrian

On Tue, Apr 4, 2017, at 12:22 PM, Donald Duckworth wrote:

We've assembled the material you requested in the referenced request. It's on a disk. How can I get that to you?

On Jan 14, 2017 6:32 AM, <adrian@mailingaddress.org> wrote:

Good morning, Mr. Duckworth.

I'd like to take a look at all communications, email or otherwise, between anyone at the WTCBID, including staff and Board members, and anyone at the City of Los Angeles during 2016. For emails this should include any message to/from/cc/bcc any address at lacity.org or any of its subdomains. Also I would like to see both emails and their attachments in their native electronic formats. This can be easily accomplished by exporting the emails as .eml, .msg, or .mbox files, which will automatically preserve attachments. If that's not feasible for you, OCR PDFs of the emails will do, but I will still need to see the attachments in their native formats.

I would also like to see copies of all agendas and minutes from WTCBID Board and committee meetings for 2016.

Thanks in advance for your help and cooperation, and I look forward to hearing from you.

Adrian Riskin

Re: CPRA request (WTCBID.2017.01.14.a)

From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, April 04, 2017 12:37 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 10 KB

I'll ask our I.T. person.

On Apr 4, 2017 12:30 PM, <adrian@mailingaddress.org> wrote:

Hey Mr. Duckworth,

It's not so easy to read optical disks these days. Perhaps you could upload it to my dropbox at:

<https://www.dropbox.com/request/GM0U4cW7Yqgk8kWrV67d>

This works just like copying stuff to a disk. You open the link and drag the folder onto it and it's transferred to me. Or maybe you have your own cloud file transfer service that you prefer?

Alternatively, can you tell me how much data there is?

Thanks,

Adrian

On Tue, Apr 4, 2017, at 12:22 PM, Donald Duckworth wrote:

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> on a disk. How can I get that to you?

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>> Adrian Riskin

>>

Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Tuesday, April 04, 2017 1:17 PM
Size: 3 KB

Thank you!

On Tue, Apr 4, 2017, at 12:37 PM, Donald Duckworth wrote:

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Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:Donald.Duckworth@duckworth.donald@gmail.com)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, April 10, 2017 6:26 AM
Size: 3 KB

Good morning, Mr. Duckworth.

If this is going to make this take much longer, maybe it would be better if I just came over and picked up the disk? Or maybe you could mail it to me? The point of Dropbox is that it's faster than mailing disks, so if it's creating a week-long bottleneck it's probably not worth the trouble.

Thanks,

Adrian

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To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, April 10, 2017 2:34 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 13 KB

I cannot make it work. Where do I mail the disk?

On Mon, Apr 10, 2017 at 6:26 AM, <adrian@mailingaddress.org> wrote:

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Re: CPRA request (WTCBID.2017.01.14.a)

From: adrian@mailingaddress.org
To: Donald Duckworth <duckworth.donald@gmail.com>
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, April 10, 2017 3:56 PM
Size: 5 KB

Dear Mr. Duckworth,

You can mail it to me at

1232 1/8 N Cahuenga Blvd
Los Angeles CA 90038

I hope you will consult further with your IT person about using cloud-based transfer. I know your BID uses it to submit your quarterly reports to the City, so it can't be that hard. The US Mail is not only slow, but it's unreliable.

Thanks,

Adrian

On Mon, Apr 10, 2017, at 02:34 PM, Donald Duckworth wrote:

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From: [Donald Duckworth <duckworth.donald@gmail.com>](mailto:duckworth.donald@gmail.com)
To: [Adrian Riskin <adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org)
Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, April 10, 2017 4:25 PM
X-Delivered-To: adrian@mailingaddress.org
Size: 16 KB

We transfer our Quarterly Reports by pin drive.

I do have an appointment set with our IT person for training on April 20.

I going to UPS right now.

On Mon, Apr 10, 2017 at 3:56 PM, [<adrian@mailingaddress.org>](mailto:adrian@mailingaddress.org) wrote:

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Subject: Re: CPRA request (WTCBID.2017.01.14.a)
Date: Monday, April 10, 2017 4:25 PM
Size: 5 KB

OK, thanks!

Adrian

On Mon, Apr 10, 2017, at 04:25 PM, Donald Duckworth wrote:

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Adrian

On Tue, Apr 4, 2017, at 01:17 PM, adrian@mailingaddress.org wrote:

EXHIBIT L

Subject: FW: Serious issues in Westchester

From: Miki Payne <Miki@hbdrollinger.com>

Date: 04/06/2017 02:55 PM

To: "'32350@lapd.online" <'32350@lapd.online>, "'Dominic.Choi@lapd.lacity.org"' <'Dominic.Choi@lapd.lacity.org'>, "'Darryl.Ito@lapd.lacity.org"' <'Darryl.Ito@lapd.lacity.org'>, SLO Casteneda <35080@lapd.online>, Kawon Villery <38717@lapd.lacity.org>, "jfarber@lawa.org" <jfarber@lawa.org>, "rmaggard@lawa.org" <'rmaggard@lawa.org>, Anna Kozma <anna.kozma@lacity.org>, Donald Duckworth <duckworth.donald@gmail.com>, Laurie Hughes <lhughes@gatewaytola.org>, Christina Davis <christina@laxcoastal.com>, "DALEY, TREVOR" <TDALEY@lawa.org>, Cody Koopmann <Cody@hbdrollinger.com>, "Steve Meyer (Steve@HBDROLLINGER.COM)" <IMCEAEX-O=HBD-DOMAIN_ou=first+20administrative+20group_cn=Recipients_cn=Steve@hbdrollinger.com>, Eric Glyn-Davies <eric@hbdrollinger.com>, Andy Loos <Andy@hbdrollinger.com>

I am unsure if this went the first time due to computer issues. Please forgive me if this is a duplicate.

From: Miki Payne

Sent: Thursday, April 06, 2017 11:38 AM

To: '32350@lapd.online'

Subject: FW: Serious issues in Westchester

From: Miki Payne

Sent: Thursday, April 06, 2017 11:37 AM

To: 'Dominic.Choi@lapd.lacity.org'; 'Darryl.Ito@lapd.lacity.org'; SLO Casteneda (35080@lapd.online); Kawon Villery (38717@lapd.lacity.org); jfarber@lawa.org; 'rmaggard@lawa.org'

Cc: Anna Kozma (anna.kozma@lacity.org); 'Donald Duckworth'; Laurie Hughes (lhughes@gatewaytola.org); Christina Davis; DALEY, TREVOR (TDALEY@lawa.org); 'Chad Molnar'; Cody Koopmann; Steve Meyer; Eric Glyn-Davies; Andy Loos

Subject: Serious issues in Westchester

Westchester Leaders,

For the last couple of months the degree of threatening and ill-behaved individuals loitering in downtown Westchester has escalated. We are now experiencing an unacceptable level of individuals who are scaring our customers and tenants and perpetrating quality of life crimes and concerns, including but not limited to: defecating on sidewalks or near our stores, urinating in public, drinking and drunk in public, threatening our guards and customers if they don't give them a quarter, yelling at customers, pedestrians and motorists, just to name a few.

We had officers respond a second time this week after other officers gave "Archie" a warning to stay off private property in the morning or they would arrest him for trespassing (we have filed trespass arrest authorizations with LAPD for all BID properties) so when Archie came back in the afternoon and was laying on the sidewalk in front of Wacky Wok, after threatening our security guard we called LAPD again. When

officers responded, our guard and manager were told that they didn't see him doing anything and if we wanted him removed, we had to go to Pacific Division and file a restraining order? Is that a new policy? Is it the policy?

It would be our goal to have a meeting (location your choice) that includes our BID Director Don Duckworth, Myself our Captains, perhaps Claudia Martin and our SLO's and put together a plan of action which we will willingly support with private security. Also, I would like to reach out to the HOPE, so if anyone can tell me the best way to do that, it would be appreciated.

Miki

dro with extension

—image001.jpg—

Miki Payne
Operations Manager
Drollinger
P R O P E R T I E S
8929 S. Sepulveda Blvd.
Suite 130
Los Angeles, CA 90045
(310) 417-8048 Ext. 15

—Attachments:—

image001.jpg

42.5 KB

EXHIBIT M

Subject: Re: Arts District Seeking Farmer Market Operator

From: Donald Duckworth <duckworth.donald@gmail.com>

Date: 07/25/2016 08:50 PM

To: Miguel Vargas <miguel@artsdistrictla.org>

CC: Jasmine Ramos <jasmine@fashiondistrict.org>, Aimiuwu Imudiasse <imiudase.aimiuwu@ladwp.com>, Amy Luke <amyl@dlba.org>, Ana Tapia <atapia@coalitionrcd.org>, Andrew Thomas <andrew@thewestwoodvillage.com>, Andy Pham <APham@sanpedrobid.com>, Anne Osman <anneosman2@gmail.com>, Ariana Gomez <ariana@fashiondistrict.org>, Barbara Romero <barbara.romero@lacity.org>, Blair Besten <blair@historiccore.bid>, Brenda Shockley <bshock8402@aol.com>, Brian Miller <granadabid@gmail.com>, Capri Maddox <capri.maddox@lacity.org>, Carol Schatz <cschatz@downtownla.com>, Cesar DeLa Cruz <cesar@agora2000.net>, Chris Serrano <serranochilipepper@yahoo.com>, Dan Hoffman <info@wilmington-chamber.com>, Danielle Condit <danielle@thescbd.com>, Darin French <darin@lani.org>, Davilos Malila <malila@silverkingusa.com>, Devin Strecker <devin@hollywoodbid.org>, Ellen Endo <board@visitlittletokyo.com>, Ellen Engelke <emengelke@aol.com>, Eugene Van Cise <eugene.vancise@lacity.org>, Frank Aguirre <frank.j.aguirre@lacity.org>, Gary Russell <gary@wilshirecenter.com>, George Yu <geoyu28@aol.com>, Heather Boylston <heather@h-rpr.com>, Hurtado Daniel <danielmhurtado@gmail.com>, Jackie Keene <Jackie.keene@lacity.org>, Jeff Chodorow <jchodorow@downtownla.com>, Jeff Zarrinam <jeff@hollywoodhotel.net>, Jessica Lall <jessica@southpark.la>, Jim Omahen <jim@mediadistrict.org>, Joanne Kumamoto <jkumamoto@aol.com>, Joe Mariani <joe@hollywoodbid.org>, John Walker <john@thescbd.com>, "Jose A. Gonzalez" <jose@fashiondistrict.org>, Joseph ROuzan <joseph.rouzan@lacity.org>, Josh Kreger <josh@southpark.la>, Kathleen Rawson <Kathleen@downtownsm.com>, Kathy Delle Donne <kadedo@earthlink.net>, Katie Gibson <katie@urbanplaceconsulting.com>, Kent Smith <kent@fashiondistrict.org>, Kerry Morrison <kerry@hollywoodbid.org>, Kraig Kojian <KraigK@dlba.org>, Laura Hill <laura@southpark.la>, Laurie Hughes <lhughes@gatewaytola.org>, Laurie Sale <rehabitat@verizon.net>, Leslie Elkan <leslie_elkan@yahoo.com>, Lisa Schechter <lisa@mediadistrict.org>, Lorena Parker <lparker@sanpedrobid.com>, Lori Moore <lmoore@sanpedrobid.com>, Marco Li Mandri <newcityamerica@aol.com>, Marie Rumsey <MRumsey@ccala.org>, Matt Severson <matthew@hollywoodbid.org>, Matt Szabo <matt.szabo@lacity.org>, Mike Russell <mike@wilshirecenter.com>, Miranda Paster <miranda.paster@lacity.org>, Misty Iwatsu <mistyli@aol.com>, Monica Carlos <monica@lani.org>, Monica Rodriguez <monica.rodriguez@lacity.org>, Nicolas Griffin <ngriffin@downtownla.com>, Nicole Shahenian <nicole@hollywoodchamber.net>, Noah Strouse <noah@historiccore.bid>, Norma Fernandez <norma@lani.org>, Patti MacJennett <pmacjennett@latourism.org>, Paul Racs <paul.racs@lacity.org>, Priscilla Hsu <priscilla@southpark.la>, Rana Ghadban <exec@chatsworthchamber.com>,

Raquel Beard <rbeard@centralcityeast.org>, Rebecca Draper <rebecca@lani.org>, Rebecca Hutchinson <rebecca@h-rpr.com>, Rena Leddy <Rena@fashiondistrict.org>, Rick Scott <rick.scott@lacity.org>, Ron Lorenzen <ron.lorenzen@lacity.org>, Rosemary Hinkson <rosemary.hinkson@lacity.org>, Salyna Cun <salyna.cun@lacity.org>, Sara Bilger <sbilger@centurycitybid.com>, Seth Polen <s.spolen@gmail.com>, Stef Dietrich <sdietrich@latourism.org>, Stephen Robbins <srobbins@sanpedrobid.com>, Steve Gibson <steve@urbanplaceconsulting.com>, Susan Levi <susan@labids.org>, Suzanne Holley <sholley@downtownla.com>, Sylvia Bianchi <executivedirector@downtownculvercity.com>, Taneda Larios <taneda.larios@lacity.org>, Thomas Kneafsey <tom@metropolitanholding.com>, Tim Byk <timbyk@yahoo.com>, Todd Steadmen <steadman@thesunsetstrip.com>, Vicki Nussbaum <vicki@villageatshermanoaks.com>

In Westchester, the BID has contributed formation costs including a 501c3, initial capital costs, and cash flow support to a 3 or 4 year Farmers' Market proforma that is intended to be self-sufficient at the end of that period. I can share the details and financials. The 501c3 Board that supervises the FM is composed of the BID President, the BID Executive Director, and a local non-profit President. The FM Operator is Cynthia Rogers (310-936-9060 / Westchester.cfm@gmail.com) who also operates another Westchester FM (different day and not in the BID area) and the Manhattan Beach FM.

On Mon, Jul 18, 2016 at 12:53 PM, Miguel Vargas <miguel@artsdistrictla.org> wrote:

Dear BID Consortium,

The Arts District community is looking for a new farmers market operator. For those of you who operate farmers markets, would you be able to share the contact information for your market operator? Also, the Arts District is interested in learning about what type of financial arrangement your BID has with your respective market operator. I would appreciate any information you could send my way.

Best Regards,

--

Miguel Vargas

Executive Director

Arts District Los Angeles B.I.D.



Re: Arts District Seeking Farmer Market Operator

24 HR HOTLINE [\(213\) 327-0979](tel:(213)327-0979)

Subject: Fwd: Urgent Alert: Supreme Court Issues Decision Regarding Personal Devices

From: Rita Moreno <rita.moreno@lacity.org>

Date: 03/10/2017 08:44 AM

To: Mary Patterson <mpaterson@canogaparkcal.com>, Bowers Sons Cleaners Bowers Sons Cleaners <bowerssons@sbcglobal.net>, Sherri Franklin <sherri@urbandesigncenter.com>, George Yu <geoyu28@aol.com>, Misty Iwatsu <mistyli@aol.com>, Blair Besten <blair@historiccore.bid>, Lisa Schechter <lisa@mediadistrict.org>, Jim Omahen <jim@mediadistrict.org>, Thomas Kneafsey <tom@metropolitanholding.com>, Erin Dolan <erin.dolan@dolanknight.com>, Heather Duffy Boylston <heather@larchmontvillagebid.com>, Rebecca Hutchinson <rebecca@larchmontvillagebid.com>, Kimberly Ramsey <kramsey@communitybuild.org>, Rafik Ghazarian <rafik@roadrunner.com>, "John T. Walker" <john@thescbd.com>, "kadedo@earthlink.net" <kadedo@earthlink.net>, Donald Duckworth <duckworth.donald@gmail.com>

Please read: Important information for BID Staff and Board Members...

----- Forwarded message -----

From: **Civitas Advisors** <marketing@civitasadvisors.com>

Date: Thu, Mar 9, 2017 at 4:00 PM

Subject: Urgent Alert: Supreme Court Issues Decision Regarding Personal Devices

To: miranda.paster@lacity.org

**NEWS
ALERT**

Urgent Alert: Supreme Court Issues Decision Regarding Personal Devices

March 9, 2017

The use of personal email accounts and devices by public officials is a hot topic throughout the United States. California just became the epicenter of the debate, with a new California Supreme Court ruling regarding the use of personal emails and text messages.

All California property and business improvement districts, and any business or tourism improvement district formed under the 1994 Law, are subject to the Public Records Act. Most districts formed under the 1989 Law are also subject to the Public Records Act.

The California Public Records Act requires disclosure of most written records, upon receipt of a request from a member of the public. Generally, the requested records must be provided in 10 days, although under certain circumstances a 14-day extension can be implemented.

In a new ruling, the California Supreme Court has determined that district-related communications sent to private emails, or text message sent to private cell phones, are considered public records and subject to disclosure upon request.

Because most assessment districts are overseen by a volunteer Board of Directors, the use of private emails and text messages is commonplace. This new Court ruling requires that practice be re-considered, as any messages and emails will have to be disclosed if they are responsive to a request received.

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--

Rita Moreno
City of Los Angeles
Office of the City Clerk
Neighborhood Services and Improvement Division
200 N. Spring Street, 2nd Floor #237
Los Angeles, CA 90012
Office (213) 978-1130
Fax (213) 978-1130

We recommend that every district make a written policy relating to records, which policy should be provided to and reviewed with all board members upon their swearing in.

We would be happy to assist your organization in creating a policy, or in scheduling a custom training session. Contact us here to learn more.

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Our mailing address is:

1102 Corporate Way, Suite 140
Sacramento, CA 95831



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EXHIBIT N

Subject: Re: Request for BID Analyst Transfer - Westchester Town Center BID
From: Miranda Paster <miranda.paster@lacity.org>
Date: 01/06/2016 03:32 PM
To: Donald Duckworth <duckworth.donald@gmail.com>

I will work w/ Rosemary on this. She should be back tomorrow.

Thanks.

On Wed, Jan 6, 2016 at 1:43 PM, Donald Duckworth

<duckworth.donald@gmail.com> wrote:

As we have discussed, I've felt for quite some time that Rick approaches me and our work in administering the Westchester Town Center BID in a very negative manner. It's as if he's looking for problems or obstacles to create that interfere with a constructive work flow. He doesn't approach our work with recommended solutions for mutual gain or a sense of team work.

If it is possible to request a BID Analyst transfer to Eugene, I would like to do so. It seems to me that everyone's life would benefit as a result.

Thanks for your consideration of my request. You can always count on my full support regardless of your response to this request. Thank you.

--

Counting my blessings - Sing and be Happy Today!

http://clerk.lacity.org/stellent/groups/departments/@clerk_master_contributor/documents/contributor_web_content/lacityp_026712.png

Subject: Re: Westchester On-Street Parking Limits
From: Anna Kozma <anna.kozma@lacity.org>
Date: 10/24/2016 06:05 PM
To: Donald Duckworth <duckworth.donald@gmail.com>
CC: Miki Payne2 <miki@hbdrollinger.com>

Sorry I read this message backwards for some reason. I can give you a call to clarify and go over the various moving pieces, as relevant to the BID. let me know when is best. Thanks Don

Anna M. Kozma
Field Deputy - Westchester/Playa
Councilmember Mike Bonin
City of Los Angeles
(310) 568-8772

On Oct 24, 2016 6:03 PM, "Anna Kozma" <anna.kozma@lacity.org> wrote:

As far as the limitations that were discussed as part of rewriting the sleeping in your car ordinance, the request for City attorney to draft a new ordinance is scheduled for Council tomorrow I believe

Anna M. Kozma
Field Deputy - Westchester/Playa
Councilmember Mike Bonin
City of Los Angeles
[\(310\) 568-8772](tel:3105688772)

On Oct 24, 2016 6:01 PM, "Anna Kozma" <anna.kozma@lacity.org> wrote:

We are looking at restricting overnight parking for Manchester east of Sepulveda to Inglewood border. It is a request that requires substantiation by LAPD however, as restricting all overnight parking generally is a public safety response. They are currently in investigation and fact gathering mode

Every parking request is evaluated on a case by case basis. We could do different requests for different parts of the BID but no general single blanket request

Let me know if that makes sense

Anna M. Kozma
Field Deputy - Westchester/Playa
Councilmember Mike Bonin

City of Los Angeles
[\(310\) 568-8772](tel:3105688772)

On Oct 21, 2016 9:02 AM, "Donald Duckworth"
<duckworth.donald@gmail.com> wrote:

When we last talked you seemed to be coordinating some time limit modifications on Westchester streets in pursuit of homeless goals for the community. Where is that effort?

I'm thinking that we should deal with the entire BID area.

Subject: Fwd: MyLADOT - Service Request Number: 69317
From: Donald Duckworth <duckworth.donald@gmail.com>
Date: 10/26/2016 06:15 PM
To: Ruben Garcia <33236@lapd.lacity.org>, Karwon Villery <38717@lapd.lacity.org>
CC: Miki Payne2 <miki@hbdrollinger.com>, Nicole Alberca <nicole.alberca@lapd.lacity.org>, Ken Husting <ken.husting@lacity.org>, Ray Lau <Ray.Lau@lacity.org>, Anna Kozma <anna.kozma@lacity.org>, Chad Molnar <chad.molnar@lacity.org>
BCC: Donald R Duckworth <duckworth.donald@gmail.com>, Christina Davis <christina@laxcoastal.com>, Cyndi Hench <kentwoodnw@aol.com>, Geoff Maleman <Gmaleman@aol.com>, OMAR PULIDO <OMAR.PULIDO@lacity.org>

Ruben & Karwon...

We in the Westchester BID area have been experiencing increases in electricity theft from our landscape lighting outlets along Sepulveda Boulevard. Vehicles can pull-up and plug-in and we have been experiencing this with increased frequency lately. Our maintenance personnel have asked that the offenders cease and desist to no permanent resolution.

We'd like to act before this behavior grows or becomes a significant law enforcement problem. So we have requested that Sepulveda Boulevard from 92nd to Manchester be designated for "No Overnight Parking" from 10 PM to 6 AM. As shown in the attached email, the City Council Office is supportive of this request, which has been submitted to LADOT. I'm believe that the Chamber and the Neighborhood Council would be as well.

We have not padlocked the individual outlet boxes in order to avoid more destructive attempts to steal BID landscape electric power and the on-going, expensive replacement costs that would entail. Since this is a theft situation, we could ask for additional enforcement, but that too seems unnecessarily expensive when other means such as parking restrictions may resolve the problem. Further, we have not encountered a similar problem during the daylight hours when hourly parking limits are in place.

We were told that our LAPD SLO's will be required to support our requested parking limit change and are therefore reaching out to you now, perhaps ahead of the system, so that new parking restrictions can be implemented as soon as possible. I have also copied LADOT staff with whom we have worked before.

As there is anything we can do to assist us in expediting this request, please let me know.

Thank you all.

----- Forwarded message -----

From: **Anna Kozma** <anna.kozma@lacity.org>

Date: Wed, Oct 26, 2016 at 3:58 PM

Subject: Fwd: MyLADOT - Service Request Number: 69317

To: Donald Duckworth <duckworth.donald@gmail.com>

Hi Don,

This is the request submitted today to DOT for No Parking overnight signage on Sepulveda.

Service request ID #69317, which in the details has requested for No Parking 10pm to 6am, on Sepulveda, b/w Manchester and 92nd.

Thank you

----- Forwarded message -----

From: <donotreply@lacity.org>

Date: Wed, Oct 26, 2016 at 2:25 PM

Subject: MyLADOT - Service Request Number: 69317

To: anna.kozma@lacity.org

Your request has been successfully submitted to the Los Angeles Department of Transportation

--



Logo5-web.

Anna M. Kozma

Field Deputy - Westchester/Playa

Councilmember Mike Bonin

City of Los Angeles

[\(310\) 568-8772](tel:3105688772) | www.11thdistrict.com



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Fwd: MyLADOT - Service Request Number: 69317

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MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

Re: Grinder Restaurant Building

Subject: Re: Grinder Restaurant Building
From: "RUBEN GARCIA" <33236@lapd.lacity.org>
Date: 10/22/2016 02:10 PM
To: "Donald Duckworth" <duckworth.donald@gmail.com>

Lets all get together maybe a conference call before we visit the location and plan out some strategies. Thanks I'm here till 6:00 PM then back on Tuesday...Ruben

>>> Donald Duckworth <duckworth.donald@gmail.com> 10/20/2016 9:29 PM >>>

Thanks Steve. Let's step up our game here.

On Oct 20, 2016 8:05 PM, "Susie & Steve Rhodes" <snsrhodes4@gmail.com> wrote:
Hi Don,

I'd be happy to meet and go through the Grinder property with you on Monday. Let me know the time that you would want to do this. I haven't seen Pixie back in the area since I saw her last Saturday, but I had heard that she had stayed there in the past. I figured that if she was back that she might be staying there again. When I saw her last Saturday she was pushing 3 shopping carts full of her stuff up Sepulveda Westway behind Ralphs. Thanks for the Trespass Order. I've copied it and will keep it with me and make copies too. I'll be checking to see if I can get a picture of anyone going in or out of the Grinder location. I will keep my eyes open for any activity at the Grinder and let you know right away.

Thanks for the support,

Steve

On Thu, Oct 20, 2016 at 6:34 PM, Donald Duckworth <duckworth.donald@gmail.com> wrote:
I would like to understand what is going on at the Grinder. You told me that you thought that there was a homeless encampment there. I believe that you said that "Pixie" had returned to the Westchester area and may be staying at that location. Let's check that out but I don't want you to enter the building alone. We should go there together on Monday (10/24) or another agreeable date next week; let's discuss.

We will also request support from LAPD and Pastor Weller.

Attached is a Trespass Arrest Authorization from the property owner of that site. By copy of this email, Ruben Garcia and Miki Payne will also have a copy of it.

I'd like to have this site secured within the next week or so. With the impending dislocation of homeless from Manchester Square, we need to be sure that Westchester is not seen as an available point of relocation.

Let me know your thoughts, Steve. I know Ruben and Miki and Pastor Weller will do the same.

Subject: FW: Serious issues in Westchester

From: Miki Payne <Miki@hbdrollinger.com>

Date: 04/06/2017 02:55 PM

To: "'32350@lapd.online" <'32350@lapd.online>, "'Dominic.Choi@lapd.lacity.org"' <'Dominic.Choi@lapd.lacity.org'>, "'Darryl.Ito@lapd.lacity.org"' <'Darryl.Ito@lapd.lacity.org'>, SLO Casteneda <35080@lapd.online>, Kawon Villery <38717@lapd.lacity.org>, "jfarber@lawa.org" <jfarber@lawa.org>, "rmaggard@lawa.org" <'rmaggard@lawa.org>, Anna Kozma <anna.kozma@lacity.org>, Donald Duckworth <duckworth.donald@gmail.com>, Laurie Hughes <lhughes@gatewaytola.org>, Christina Davis <christina@laxcoastal.com>, "DALEY, TREVOR" <TDALEY@lawa.org>, Cody Koopmann <Cody@hbdrollinger.com>, "Steve Meyer (Steve@HBDROLLINGER.COM)" <IMCEAEX-O=HBD-DOMAIN_ou=first+20administrative+20group_cn=Recipients_cn=Steve@hbdrollinger.com>, Eric Glyn-Davies <eric@hbdrollinger.com>, Andy Loos <Andy@hbdrollinger.com>

I am unsure if this went the first time due to computer issues. Please forgive me if this is a duplicate.

From: Miki Payne

Sent: Thursday, April 06, 2017 11:38 AM

To: '32350@lapd.online'

Subject: FW: Serious issues in Westchester

From: Miki Payne

Sent: Thursday, April 06, 2017 11:37 AM

To: 'Dominic.Choi@lapd.lacity.org'; 'Darryl.Ito@lapd.lacity.org'; SLO Casteneda (35080@lapd.online); Kawon Villery (38717@lapd.lacity.org); jfarber@lawa.org; 'rmaggard@lawa.org'

Cc: Anna Kozma (anna.kozma@lacity.org); 'Donald Duckworth'; Laurie Hughes (lhughes@gatewaytola.org); Christina Davis; DALEY, TREVOR (TDALEY@lawa.org); 'Chad Molnar'; Cody Koopmann; Steve Meyer; Eric Glyn-Davies; Andy Loos

Subject: Serious issues in Westchester

Westchester Leaders,

For the last couple of months the degree of threatening and ill-behaved individuals loitering in downtown Westchester has escalated. We are now experiencing an unacceptable level of individuals who are scaring our customers and tenants and perpetrating quality of life crimes and concerns, including but not limited to: defecating on sidewalks or near our stores, urinating in public, drinking and drunk in public, threatening our guards and customers if they don't give them a quarter, yelling at customers, pedestrians and motorists, just to name a few.

We had officers respond a second time this week after other officers gave "Archie" a warning to stay off private property in the morning or they would arrest him for trespassing (we have filed trespass arrest authorizations with LAPD for all BID properties) so when Archie came back in the afternoon and was laying on the sidewalk in front of Wacky Wok, after threatening our security guard we called LAPD again. When

officers responded, our guard and manager were told that they didn't see him doing anything and if we wanted him removed, we had to go to Pacific Division and file a restraining order? Is that a new policy? Is it the policy?

It would be our goal to have a meeting (location your choice) that includes our BID Director Don Duckworth, Myself our Captains, perhaps Claudia Martin and our SLO's and put together a plan of action which we will willingly support with private security. Also, I would like to reach out to the HOPE, so if anyone can tell me the best way to do that, it would be appreciated.

Miki

dro with extension

—image001.jpg—

Miki Payne
Operations Manager
Drollinger
P R O P E R T I E S
8929 S. Sepulveda Blvd.
Suite 130
Los Angeles, CA 90045
(310) 417-8048 Ext. 15

—Attachments:—

image001.jpg

42.5 KB